("OSS") to support competition in local exchange services; (2) the ways in which the BellSouth SGAT does not comply with the non-network aspects of the competitive checklist, including access to structure, access to E911 & 911 services, access to directory assistance services, access to operator call completion services, access to call completion databases, interim local number portability, and resale; and (3) other issues that raise fundamental questions about BellSouth's capabilities to support competition in the local telephone service market.

OPERATIONS SUPPORT SYSTEMS

Q. BEFORE DISCUSSING THE PARTICULAR ISSUES RAISED BY THE CURRENT STATE OF BELLSOUTH'S OSS FUNCTIONS, CAN YOU PROVIDE SOME GENERAL BACKGROUND ABOUT OSS FUNCTIONS?

A. Yes. Operations Support Systems, or OSS, consist of all the computerized and automated systems, together with related business processes, that ensure that a telecommunications carrier can satisfy customer needs and expectations. In the developing competitive environment, carriers will not be able to compete without powerful and efficient operations support capabilities.

Like all BOCs, BellSouth has for years utilized highly complex OSS systems to successfully manage its internal processes and customer interactions. These well-tested systems ensure, for example, that customer service representatives have

immediate real-time access to all information necessary to respond fully and correctly to customer queries about such things as the variety and prices of services available, or the status of repair calls. They also ensure, among other things, that customer orders are correctly processed and that bills are timely, complete, and accurate.

Q. WILL THE ILECS' OSS NEED TO BE MODIFIED TO SUPPORT LOCAL COMPETITION?

A. Yes. Consistent with the Act, Incumbent Local Exchange Carriers ("ILECs") must make changes to their OSS to enable competition to develop in local markets. To the extent new competitors such as MCI must rely on the ILECs' networks and OSS capabilities for a realistic opportunity to compete, it will be essential for the ILECs to develop and implement OSS interfaces and downstream processes sufficient to ensure that they can provide unbundled network elements and resale in a timely, reliable, and nondiscriminatory fashion in volumes adequate to satisfy demand. In addition, the FCC's rules specifically require that ILECs develop interfaces capable of providing CLECs nondiscriminatory unbundled access to its OSS functions themselves. This requirement means that ILECs must provide parity to requesting CLECs in at least three respects: the scope of information available, the accuracy of information supplied, and the timeliness of communications.

In order to determine whether a BOC has satisfied these requirements -- namely, that it has implemented OSS systems and interfaces capable of ensuring that it can "fully implement" the competitive checklist, and that it provides nondiscriminatory unbundled access to OSS functions and databases -- two questions are key: First, are the interfaces and specifications the BOC employs to communicate with the CLECs adequate to fulfill pro-competitive needs? Second, assuming the BOC proposes to use a competitively acceptable interface to provide competitors access to a particular OSS function, has there been sufficient experience with the interface and associated systems and processes so as to ensure they will work "as advertised"?

Q. PLEASE ELABORATE ON THE DIFFERENT TYPES OF OSS INTERFACES.

A. In theory there are numerous ways a CLEC might be able to access BOC OSS functions. One basic distinction is between automated access and manual access. Manual access means that the CLEC's access is mediated by human intervention on the part of the BOC. For example, when a CLEC orders a resale service or unbundled element manually, it ordinarily means that the CLEC transmits an order

form to the BOC by facsimile, at which point a BOC employee types the information supplied on the form into the BOC's computerized order entry system. Manual intervention also occurs when, after information is exchanged electronically, a BOC representative must re-enter or otherwise manipulate it before it can be processed downstream.

Automated access means that information is directly exchanged between the CLEC and BOC computers. This can be done through a variety of different interfaces and protocols that range widely in degrees of sophistication and utility.

The most sophisticated type of automated access is termed electronic bonding ("EB"). Electronic bonding solutions are the most sophisticated and useful because, in certain applications, they can allow new entrants to approximate the same real-time access to the BOC's functions as the BOC itself enjoys. From the customer's perspective, interactions with a CLEC that has electronically bonded to the ILEC are indistinguishable from interactions with the ILEC. Furthermore, because electronic bonding links the CLEC's existing OSS system to that of the ILEC, the CLEC does not need to develop a new OSS interface to communicate with the ILEC for a given function.

Less sophisticated automated access arrangements involve the transfer of data between computer systems in batches. These "batch transfer" solutions work much like electronic mail, but are much more rigorously structured in terms of format, syntax, and vocabulary. The standard batch transfer interface for most applications, Electronic Data Interface ("EDI"), is also termed a "transactional" interface because it has long been used for ordinary business transactions like exchanging bills of lading or service orders. File transfer protocol, perhaps the classic batch interface, transmits large amounts of data at scheduled and infrequent intervals.

Q. ARE MANUAL INTERFACES ADEQUATE TO SUPPORT LOCAL COMPETITION?

A. No. Manual access arrangements are not compatible with MCI's needs as a new entrant seeking to compete against an incumbent LEC. Every manual intervention causes delay, sometimes substantial, and creates significant risk of error. By relying upon manual interventions, the ILEC can hold its competitors hostage to its own response time, hours of operation, and ability (or incentive) to provide accurate information. Also, manual arrangements increase CLECs' costs in two ways: First, CLECs must employ more people to handle the process and to audit the ILEC's performance. Second, and similarly, these arrangements increase the ILEC's costs by requiring more employees to input data, etc, and the ILEC is likely

to try to pass its own inflated costs through to the CLECs. Accordingly, solutions that require manual intervention on the ILEC's side cannot be acceptable in either the short or long term.

Q. WHAT AUTOMATED ACCESS ARRANGEMENTS WOULD BE SATISFACTORY?

A. Each ILEC should adopt the automated interfaces and data formats adopted and approved by the relevant national standard-setting bodies or industry forums. The three principal groups are: the Ordering and Billing Forum ("OBF") of the Carrier Liaison Committee; the T1 Committee; and the Electronic Communications Implementation Committee ("ECIC"). All three are sponsored by the Alliance for Telecommunications Industry Solutions ("ATIS") and accredited by ANSI. ILECs should adopt standardized systems for two reasons.

First, for CLECs that hope to compete in markets presently controlled by different BOCs it is absolutely critical that interfaces are uniform. The costs of developing systems and software and of training necessary to use any particular interface are substantial. This is why most BOCs try to unify their own systems. BellSouth, for example, uses the same OSS interfaces and formats throughout its region and has a single OSS service center for CLECs, the Local Customer Service Center, to serve all of the states within its region. A nationwide CLEC like MCI must be able to

realize similar economies. We can only do so, however, if the several large ILECs conform to nationally standardized interfaces and formats.

Second, the industry forums are well positioned to resolve which interfaces and formats are reasonably necessary and practical for each particular OSS function or sub-function. Different functions and services may create different OSS needs. While electronic bonding solutions -- with their real-time accessibility -- are essential for any function that is conducted while the carrier's service representative is actually speaking with the end-user (such as all pre-ordering functions), some sorts of batch transfer solutions might adequately serve competitive needs for other functions.

For both of these reasons, I agree with the FCC that "[i]deally, each incumbent LEC would provide access to support systems through a nationally standardized gateway." See FCC, First Report and Order, ¶ 527 (Aug. 8, 1996). Consistent with this view, MCI is investing its development monies for OSS in the technical interface solutions developed through the industry forums. The FCC has chosen to rely on the carriers to agree to nationally standardized interfaces voluntarily. The likelihood that the large ILECs and CLECs will reach voluntary consensus on nationally uniform interfaces will be sorely tested if the BOCs are allowed to offer in-region long distance services before such solutions are adopted. Because the

time and incremental capital investment required for CLECs to develop non-standard OSS interfaces represents a considerable barrier to entry, regulatory incentives toward standardization are critical.

Q. IN THE ABSENCE OF INDUSTRY STANDARDS, WHAT OSS INTERFACES SHOULD ILECS ADOPT?

A. While the industry forums have made substantial progress, they have not yet established standards for all OSS functions. In particular, they have not finalized interfaces and standards for the information exchanges that typically occur before a CLEC actually places an order with an ILEC. To the extent that standard-setting forums have not yet adopted standards for all functions, the BOC should be expected to adopt the least costly interim solution that would give requesting carriers the same level of access to the BOC's OSS functions as the BOC itself enjoys. It is not reasonable for individual large ILECs to implement any interim solutions that would require CLECs to commit substantial resources of their own to access the ILEC's solution when equally adequate interim solutions can be devised that would prove less costly to the ILEC's would-be local competitors.

In short, a BOC's OSS interfaces should be deemed satisfactory only if these conditions are satisfied: (1) Wherever there exists an existing industry standard, the BOC must have adopted and implemented it; and (2) wherever an industry

standard does not yet exist, the BOC must (a) enter into a binding contractual commitment (backed up by adequate contractual and regulatory penalties) to comply with industry standards as soon as possible (pursuant to a specified implementation schedule) and (b) offer and implement an interim solution that gives requesting carriers the same level of access that the BOC's operational groups have to its systems, and that is as consistent as possible with expected industry standards. Because OSS interfaces, like other software packages and operating protocols (e.g., WordPerfect and Microsoft Windows) are periodically updated and improved, conformance with industry standards entails adoption of the most advanced available specifications for a given standardized interface. For example, that would mean BOCs should presently be using the long-available EDI version 6.0 for ordering functions and should shortly transition to the recently OBF-approved version 7.0.

Q. WHAT OSS CAPABILITIES ARE NECESSARY, BEYOND ELECTRONIC INTERFACES?

A. The adoption and implementation of an appropriate OSS interface, configured to appropriate specifications, is a necessary condition for the development of local competition, but it is far from sufficient. The interface merely governs the communication between the ILEC and CLECs. The theoretical capacity for rapid and efficient communication between the carriers is of little use if either the ILEC

lacks the internal systems necessary satisfactorily to effect the functions a particular interface is designed to support, or the CLECs lack the systems, software, and training needed to make efficient and effective use of the OSS access provided. Therefore, before a BOC can establish that it will be able to provide unbundled network elements or resale services in a competitively acceptable manner, it must demonstrate both that its OSS interfaces are linked to downstream systems that can provide the necessary services in a prompt and trouble-free fashion and that it provides adequate training and support to competing local carriers.

Once the ILEC has devised, tested, and implemented its interfaces, it remains to ensure that the LEC has designed, developed, and tested business processes adequate to effect the relevant inter-carrier business functions. Because this is a critical point that BellSouth has not addressed, at least with MCIm, I would like to elaborate.

OSS is not just about inter-carrier interfaces. To the contrary, as mentioned earlier, local exchange carriers rely on advanced OSS capabilities to run their internal operations; these capabilities have nothing do with the particular LEC's relationship to other carriers. Some of these processes will work essentially the same way whether the function at issue is performed for an end-user or a CLEC.

For example, when a customer orders an entirely new line from a reseller, the reseller basically stands in the shoes of the BOC: If the interfaces between the two carriers work as they should, the fact that the pre-ordering and ordering processes are mediated through a new carrier (the CLEC) should not add additional complication to the BOC's existing provisioning systems. That is, the provisioning function itself should look much the same regardless whether the end-user takes that service directly from the BOC or from a reseller of the BOC's service.

But there are other ways in which the new CLEC-ILEC relationship imposes new burdens on the ILEC's downstream systems. For example, when a CLEC resells an existing service to an existing ILEC customer, the processing of that order requires a communication between the ILEC's ordering and billing systems that the ILEC does not otherwise engage in for itself. In other words, the ILECs were not required to migrate an existing line with existing vertical services prior to the implementation of the resale requirements. Similarly, when a CLEC orders unbundled elements, the new challenge for the ILEC is not only to receive and understand that order (this is where the ordering interfaces come in), but also to give effect to that order. Before the 1996 Act, the ILECs did not have OSS systems in place to effectuate the unbundling of, say, local switching. Today, however, ILECs must provide additional personnel and material resources to support such CLEC orders.

Assuming that an ILEC has deployed an appropriate interface and has adequately tested downstream systems that can accommodate all foreseeable demand in a nondiscriminatory fashion, it is critical that the CLEC is able to use the ILEC's interfaces effectively. The ILECs have a responsibility to assist the CLECs in this regard, because the ILECs select the interface, tailor its specifications and vocabulary, and control the timing of its implementation. This responsibility holds even when a BOC adopts an interface approved by an industry forum, as most industry-standard interfaces are very loosely defined to allow individual carriers great flexibility in tailoring their own specifications. Consequently, just as the market requires the manufacturer of a complicated software package to provide initial and ongoing customer support, regulators must ensure that the BOCs provide CLECs with adequate training and assistance – including complete and intelligible manuals and pull-down on-screen menus where necessary.

Q. WHAT TESTING IS NECESSARY TO ENSURE THAT OSS CAPABILITIES ARE FUNCTIONING PROPERLY?

A. The process of ensuring that the business processes linked to a given OSS interface work as planned is itself lengthy and requires careful planning and testing. After each carrier's systems are developed and deployed, it is necessary to conduct "integration" testing – full end-to-end trials designed to make sure that the systems can communicate properly with each other to accomplish the intended results in

the designed manner. After integration testing has been successfully completed, the systems may be put into actual competitive use, supporting "live" customer transactions. Even once this stage of actual implementation is reached, however, testing is not completed. To the contrary, it is almost inevitable that the early stages of actual competitive use will reveal design and operating flaws that had escaped detection during integration testing, thus requiring further trouble-shooting and system modification.

From an OSS perspective, paper promises are not enough to ensure effective real-world application. Because deploying "operationally ready" OSS is a substantial and time-consuming undertaking, there is a real difference between saying a system is ready and actually using it to provide services in a commercially satisfactory way. In light of the innumerable potential glitches and pitfalls that must be eliminated prior to commercial availability, one cannot know how well things can be provided until they are supported by a full and varied track record of having been provided. In short, OSS must be in real competitive use (not merely promised) and subject to auditing and monitoring of key performance indicators before OSS can be deemed to be operationally ready.

Q. PLEASE SUMMARIZE YOUR CONCLUSIONS CONCERNING THE OSS CAPABILITIES GENERALLY REQUIRED TO SUPPORT COMPETITION IN THE LOCAL TELEPHONE SERVICE MARKET.

A. As a general matter, any OSS system will need to meet three tests before it can be certified as sufficiently robust to provide a foundation for competition in the local service arena. First, the system must not rely on any manual interfaces for basic functions, such as ordering loops or requesting customer service records. Second, the system must comply with national industry standards. Otherwise, CLECs will be forced to developed numerous, ILEC-specific interfaces, and consumers will suffer by paying higher prices. Finally, and most fundamentally, it will be impossible to determine whether a particular OSS capability can support competition until the capability has been in actual, commercial use for a meaningful period of time. For OSS capabilities, "the proof will be in the pudding." Any other approach to evaluating the suitability of OSS capabilities could lead to a premature endorsement of ILEC entry into long distance and, accordingly, to serious anti-competitive consequences.

Q. AT PRESENT, ARE BELLSOUTH'S OSS CAPABILITIES ADEQUATE TO SUPPORT LOCAL COMPETITION?

A. In many respects, BellSouth's current OSS capabilities are inadequate to support competition in the local exchange market. Numerous functions rely on manual

intervention, and CLECs can expect that substantial service problems will result from these arrangements. Moreover, BellSouth's SGAT does not promise to adhere to industry standards in the OSS arena. As discussed above, without standard interfaces, national CLECs such as MCI will find it prohibitively expensive to compete against ILECs. ILECs in every region, or even every state within a region, could generate idiosyncratic OSS requirements that would defeat any economies of scale that CLECs might hope to achieve.

Given the existing state of affairs, the Commission's endorsement at this point of BellSouth's participation in interLATA services would be a tremendous detriment to furthering local competition. BellSouth's primary incentive to lower the hurdles posed by its limited OSS capabilities would be removed, and CLECs would face continuing operational obstacles in their attempts to bring local competition to Georgia.

In its negotiations with MCI, BellSouth has committed to specified time lines for implementing electronic bonding. BellSouth has agreed to make EB available for pre-ordering and ordering functions within one year after the implementation of interexchange EB. With respect to local maintenance, BellSouth has committed to implementing EB within one year of the effective date of its interconnection contract with MCI. These paper promises, while indicating BellSouth's intent to

institute EB, should not be considered the equivalent of actual, tested, in-use systems. As explained above, an OSS system must be up and running before it is possible to validate its readiness to support local competition. And as I will discuss further below, MCI's experience with BellSouth in related areas demonstrates that BellSouth is likely to have significant difficulties in implementing these sophisticated systems.

BellSouth's current OSS capabilities can be discussed in terms of the five discrete functions performed by OSS: pre-ordering, ordering, provisioning, maintenance & repair, and billing. The pre-ordering function involves the exchange of information between carriers prior to, and in anticipation of, the placing of an actual order. As opposed to pre-ordering, which concerns interactions with customers to determine which services to order, ordering relates to the processes required for a CLEC to submit an actual order for either unbundled network elements or resold services. Provisioning involves the exchange of information between carriers in which one executes a request for a set of products or services from the other, with attendant acknowledgments and status reports. Maintenance and repair relates to how those two physical services will be provided, as opposed to ordering and provisioning, which relate to how the need for those processes will be communicated. Finally, OSS functions that support billing keep track of CLEC and/or CLEC customer usage of ILEC services and facilities. Billing systems also provide information in

various formats from the ILEC to the CLEC, and vice versa. I will discuss each of these OSS functions as they relate to facilities-based and resale components.

Q. ARE BELLSOUTH'S CURRENT PRE-ORDERING INTERFACES ADEQUATE TO SUSTAIN LOCAL COMPETITION?

A. No. I do not believe that the OSS interfaces presently relied upon by BellSouth to provide pre-ordering functions are up to the task of supporting local competition, on either a network elements or a resale basis. I reach this conclusion primarily due to the number of manual interventions required during BellSouth's OSS procedures and due to BellSouth's inability to provide real-time information through its interfaces.

There are at least seven key pre-ordering sub-functions that must be provided to all telecommunication carriers: (1) access to customer service records; (2) the ability to select and reserve telephone numbers while the end-user is on-line; (3) determination of features available to the end-user; (4) the ability to select an order due date and to schedule any necessary outside work while the end-user is on-line; (5) address validation; (6) access to a potential subscriber's current directory listings; and (7) access to the information that a CLEC would require at the pre-ordering stage in order to convert an existing customer services through an unbundling situation involving a second CLEC. At present, BellSouth's interfaces

do not support many of these requirements, especially the sub-functions supplying the real-time information that CLECs will need to provide to their potential customers in order to have any hope of competing against BellSouth. The overwhelming business requirement for a pre-ordering interface is the ability of the ILEC system to provide real-time, up-to-date information within seconds of an electronic request – while the customer is on the line. Anything short of this key capability fails to meet customers' expectations for customer service from any modern business organization, whether it is providing credit, insurance, catalog, or telephone services.

The Commission has previously found that BellSouth's interfaces are sufficient to meet the "interim requirements" of CLECs. See Order, Docket No. 6865-U, p. 69. Indeed, the Commission has been at the forefront of state commissions in mandating parity of access to operations support systems. See FCC, First Report and Order, ¶ 519 (Aug. 8, 1996) (CC Docket No. 96-98). Although much progress has already been made with respect to OSS interfaces in Georgia, and while it may be true that CLECs such as MCI can "get by" with the interim OSS measures adopted by BellSouth, the simple fact of the matter is that these measures cannot realistically support local competition. In its arbitration decision in Docket No. 6865-U, this Commission found that BellSouth must "expeditiously

develop and deploy an on-line means for MCI to receive customer service records. See Order, Docket No. 6865-U, pp. 69-70. In their present state, BellSouth's OSS interfaces therefore should not serve as the basis for permitting it to enter the long distance arena.

BellSouth's interim methods for providing pre-ordering information to both facilities-based competitors and resellers are clearly inadequate. In its "Facility Based Ordering Guidelines" ("FOG") and its "Resale Ordering Guidelines" ("ROG"), BellSouth offers several types of pre-ordering information to CLECs. This information includes access to customer service records ("CSRs"), feature and service availability, the Regional Street Address Guide ("RSAG"), telephone number assignment, and due date scheduling. See FOG, pp. 48-51; ROG, pp. 27-28. The FOG and the ROG dictate a bewildering array of interim methods for accessing the different databases required to provide pre-ordering information, including faxed requests, downloaded data files, and EDI. None of these methods provides the type of real-time access that will be necessary to foster local competition.

More specifically, BellSouth does not provide real-time access to CSRs. CSRs are necessary for CLECs to place orders for both unbundled network elements and resold services. The CSR contains information relating to the services that the

customer is currently receiving, as well as accurate billing name and address information. Without this information, CLECs will find it difficult to advise potential customers concerning the best mix of services to meet their needs. In addition, BellSouth's systems will reject resellers' orders unless the customer's name and address, as reflected in the CSR, match exactly. This lack of immediate access to CSRs will, at a minimum, create significant delays in CLECs abilities to respond to customer requests for service.

To add insult to injury, BellSouth requires written letters of authorization ("LOAs") from customers before it will grant CLECs access to CSRs. See FOG, pp. 48-49; ROG, pp. 30-31. Obtaining a written, signed LOA will not suffice in dealings with residential and small business customers, who generally do business with telephone companies over the phone and who are less likely to have ready access to fax machines by which they could obtain and submit an LOA in a reasonable amount of time. Such residential or business customers would surely lose patience with a CLEC long before it would be possible to receive and return a LOA by mail. Moreover, BellSouth has only required verbal authorizations from its own customers prior to obtaining their customer payment histories from other ILECs.

I note that, contrary to the requirements of the FOG and the ROG for a written

LOA, the Commission has not ruled in an arbitration order that BellSouth may require written LOAs. To the extent that BellSouth relies on the terms contained in its SGAT, the FOG, and the ROG to support its entry into long distance, these documents are clearly insufficient to support local competition, for the reasons discussed immediately above. I also note that, per the Commission's arbitration order, MCI is working with the Georgia CUC to devise appropriate procedures relating to obtaining access to CSRs and credit/billing information. See Order, Docket No. 6865-U, p. 70.

Another problem with BellSouth's requirement for a LOA prior to allowing access to CSRs is that CLEC customer service representatives cannot check that all of the customer information needed to submit the order is correct without calling the customer back to verify, after reviewing the CSR. BellSouth's systems will reject any order that does not contain an exact match between the name and address on the CSR and the name and address on the order.

Further, BellSouth has designed a cumbersome interim method for customers to select telephone numbers during pre-ordering in cases where a CLEC does not have an NXX code. Instead of permitting CLECs access to BellSouth's telephone reservation system, BellSouth is proposing that CLECs should request a pool of up to 100 numbers per Common Language Location Identifier. See FOG, p. 30;

ROG, p. 89. Although BellSouth is expected to soon be able to provide access to number selection database, its inability to provide such access at present is further evidence of its unreadiness to support local competition.

BellSouth also does not have the capability to permit CLECs to schedule due dates over the phone, even for the most basic exchange services. Customers expect and deserve to be informed of service start dates in real-time. But BellSouth intends to require CLECs to submit Local Service Requests ("LSRs") via an electronic interface prior to assigning a due date. See FOG, p. 28; ROG, p. 84. Once BellSouth provides a due date to the CLEC, the CLEC would then have to call the customer back to coordinate scheduling of the installation. If the customer requires a different due date, the CLEC would have to submit a second LSR and to coordinate BellSouth's response with the customer once again. Few customers would tolerate such hassles simply to initiate or change telephone service.

In addition, BellSouth has proposed to permit CLECs access to the various databases necessary for pre-ordering (e.g., the Regional Street Address Guide) via a web-type server, in which the CLEC customer service representative would have to visually read information from the BellSouth database, manually input the information into the CLEC's internal order entry system, and then submit the order to BellSouth. See FOG, p. 50; ROG, p. 27. Such web-based applications have

severe limitations, in that they preclude obtaining data in a real-time, on-line manner for customers waiting on the phone. They require navigation through numerous screens or windows in order to obtain responses to simple inquiries; these applications do not provide the data requested or necessary error messages dynamically back to the user without some manual steps. By contrast, BellSouth customer service representatives have one integrated platform through which they take customers' orders. This disparity in access to BellSouth's OSS will only become more pronounced as the volume of local competition grows: CLECs could easily be overwhelmed by the manual steps necessary to pre-order. These types of manual interfaces are therefore unacceptable in a fully competitive marketplace.

In addition, the FOG and ROG do not mention if or how (1) CLECs will be able to access potential customers' directory listing information during the pre-ordering process and (2) CLECs will be able to determine customer information concerning customers of other CLECs. See FOG, p. 50; ROG, p. 27. BellSouth will need to address these critical areas of information in order to fully implement local competition in Georgia.

In summary, the rudimentary OSS systems that BellSouth currently has in place for pre-ordering will serve as a significant anti-competitive hurdle. New customers

attempting to do business with CLECs will immediately notice the inability of CLECs readily to access information that BellSouth customer service representatives have at their fingertips. In fact, CLECs attempting to use BellSouth's primitive pre-ordering systems could suffer long-term damage, as consumers may come to associate CLECs will cumbersome service and therefore hesitate to purchase from CLECs even once BellSouth has implemented more suitable EB pre-ordering solutions.

Q. ARE THERE ANY DEFICIENCIES IN BELLSOUTH'S ORDERING CAPABILITIES?

A. Yes. BellSouth's ordering procedures require far too many manual interventions to provide a sound basis for active competition.

Interconnection and Access to Unbundled Elements. The FOG states that two options are available for ordering unbundled network elements, either via facsimile or via the Exchange Access Control and Tracking System ("EXACT") electronic interface. See FOG, p. 119. Neither of these options is competitively viable over the long run. Both procedures ultimately require that BellSouth employees manually enter CLECs' orders into the BellSouth ordering system. Both procedures accordingly do not provide parity of service with that available to BellSouth from itself, and they both will inevitably lead to significant errors and

delay. While these ordering options will have to suffice for the time being, they should not be accepted by the Commission as adequate justification for BellSouth's entry into long distance.

Over and above the offerings in its SGAT and the FOG, BellSouth is offering MCI the ability to use an EDI, batch-type interface for ordering. This interface is not acceptable, however, because it is essentially a glorified form of electronic mail. MCI would merely have the ability to send batches of orders to BellSouth, which would then print out the messages and manually re-enter them into its ordering systems. The possibility of error and delay under even these improved procedures is substantial.

Moreover, BellSouth has not provided for electronic ordering of interim local numbering portability ("ILNP"). The FOG states that paper forms are to be used to order ILNP. See FOG, p. 52. Facilities-based competitors will have great difficulty in establishing a customer base if basic functions such as ILNP are relegated to manual intervention.

BellSouth's OSS is competitively unsatisfactory for the additional reason that it provides for no "flow through" from ordering to provisioning. Once a CLEC has submitted an order and BellSouth has verified the accuracy of the order,